



**STATE OF CONNECTICUT**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**



February 4, 1985

**FEB 13 1985**

Mr. James D. Wickwire  
Plant Engineer  
Pratt and Whitney Aircraft Group  
Division of United Technologies  
400 Main Street  
East Hartford, CT. 06108

RCRA RECORDS CENTER  
FACILITY Pratt & Whitney Main St  
I.D. NO. CTD990672081  
FILE LOC. R-1B  
OTHER RDMS #2790

Re: Part B Application  
Pratt & Whitney Aircraft Group  
400 Main Street  
East Hartford, Connecticut 06106  
EPA I.D. No. CTD990672081

Dear Mr. Wickwire:

The Connecticut DEP has conducted a review of Pratt & Whitney Aircraft Group, 400 Main Street, East Hartford, Connecticut preliminary application under the Resource Conservation and Recovery Act (RCRA) for a permit to store, treat and dispose of hazardous waste. A review of the preliminary application has been made to determine if the information submitted is complete under Section 25-54cc(c)-16 of the Connecticut Hazardous Waste Management Regulations and 40CFR Section 270. It has been determined that the preliminary application is incomplete and we have specified in our attachment to this letter the additional information needed.

Further processing of your permit will begin when this information is received. Please submit the necessary information within 45 days of receipt of this request. After DEP determines that the application is complete, any additional information request will be limited to that necessary to clarify, modify or supplement previously submitted material.

Your response to our comments may be in the form of a totally revised complete Part B application or revised pages which can be inserted into the original Part B submission.

If you choose to submit revised pages, please provide the following information.

1. Page numbers should be shown for the entire application;
2. For each page submitted, indicate if it is a revision to a page in the original submitted or a new page not contained in the original submittal; and
3. Date or code each page, for example: 32(R-5/7/84) means page 32 revised May 7, 1984.

Phone:

165 Capitol Avenue • Hartford, Connecticut 06106

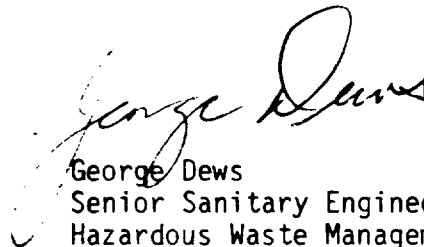
*An Equal Opportunity Employer*

Page two  
Mr. James D. Wickwire  
Pratt & Whitney Aircraft Group  
Part B Permit Application  
February 4, 1985

All revisions to your Part B application must include a new certification with the appropriate signatures as required by 40CFR Section 270.11. Additionally, if you wish to claim confidentiality on any new information, please submit a claim in accordance with 40CFR Section 270.12.

If there are any questions, please call (203) 566-5712.

Sincerely,

A handwritten signature in cursive script, appearing to read "George Dews".

George Dews  
Senior Sanitary Engineer  
Hazardous Waste Management Section

GD/jeb

CC: W. Hoffman - EPA  
B. Giroux - DEP

Certified Mail

Return Receipt Requested

Attachments

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

January 16, 1985

George Dews, Senior Sanitary Engineer  
Hazardous Waste Management Section  
Department of Environmental Protection  
165 Capitol Ave/State Office Building  
Hartford, Connecticut 06106

Re: Notice of Deficiency for the Pratt and Whitney Aircraft  
Group, East Hartford, Connecticut - EPA ID No. CTD990672081.

Dear Mr. Dews:

Enclosed is the Notice of Deficiency for the recently submitted  
Draft response from Pratt and Whitney, 400 Main Street, East  
Hartford, Connecticut, as revised to include your comments.  
Section O - Liquid Injection Incinerator will be covered in a  
later NOD. Please send me a copy of your cover letter when  
issued to the company.

If you have any questions, I can be reached at (617) 223-5902 if  
you have any questions.

Sincerely,

Andrew Hoffman, Chemical Engineer  
CT/RI Waste Programs Section

EPA:IWM:SWPB:A.HOFFMAN:eac:3-4448:1/16/85:Liz Disc B

CONCURRENCES							
SYMBOL	HSC						
SURNAME	HOFFMAN						
DATE	1-16-85						

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

ATTACHMENT: Pratt and Whitney Aircraft Group  
400 Main Street  
East Hartford, Connecticut  
EPA I.D. Number CTD990672081  
Permit Application Notice of Deficiency

The following information outlines areas where the Pratt and Whitney Permit Application does not meet the requirements for a RCRA Part B permit application given in 40 CFR §270 and §264 and in sections 25-54cc(c)-16(d) and 25-54cc(c)-19 of the Connecticut Hazardous Waste Management Regulations. Additional information is necessary in each of the following areas in order to begin a more technical review of Pratt and Whitney's permit application:

I. GENERAL INFORMATION REQUIREMENTS

Section C - Waste Analysis Plan - (40 CFR §§270.14(b)(3) and 264.13(b))

Describe the Quality Control and Quality Assurance procedures for all sampling and analysis methods.

Section F - General Contingency Plan - (40 CFR §§270.14(b)(7) and 264, Subpart D)

1. Provide a map of the evacuation plan showing work sites, evacuation routes, alternate evacuation routes and check in points.
2. Please revise the Incompatible Waste Table (Appendix B) to list the wastes handled at the Pratt and Whitney facility, only.
3. Provide a map showing the location of the emergency equipment within the facility.

Section L - Financial Assurance and Liability Insurance - (40 CFR §§270.14(b)(17) and 264, Subpart H)

The wording in paragraphs 2 and 3 of the Chief Financial Officer Letter (page 79) are not identical to the wording in 40 CFR §264.151.

## II. SPECIFIC INFORMATION REQUIREMENTS

### Section M - Storage of Containers - (40 CFR §§270.15 and 264, Subpart I)

1. Since the maximum free liquid drum count is based precisely on the paint waste assumption of 60% liquid describe the method used to identify and assure that the liquid content does not exceed this amount. A conservative assumption that each drum is 100% and a corresponding maximum drum count may be easier to control.
2. Provide copies of the computer reports showing the method being used to monitor the working drum capacity in the container storage area.

NOV 14 1985

11/8/85

Andy.

Enclosed are my comments  
on PEWA East Hartford CTD 990672081  
Pa 1 B permit application received  
Nov. 1, 1984.

Section C - Waste Analysis Plan  
(40 CFR § 270.14(b)(2))

Describe the Quality Control and Quality  
assurance procedures for all  
sampling and analysis.

Section M - Storage of Containers  
(40 CFR § 270.15 and 264 Subpart I)

Provide copies of computer reports  
showing method being used to  
monitor working drum capacity  
in container storage area.

Describe the method used to identify and assume the liquid content in drums does not exceed 60%. An conservative assumption that each drum is 100% full may be easier to control.

Section 5 - Financial Assurance and Liability Insurance.

40CFR 270.14(c)(17) and 26 & Subpart H

Minor wording change made in No. 2 and No. 3 of Chief financial officers state ment

*[Signature]*